

UNITED STATES BANKRUPTCY COURT
DISTRICT OF MASSACHUSETTS
(Eastern Division)

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|---------------------------------|---|-----------------------|
| _____ |) | |
| In Re: |) | |
| Edgard Vasques de Miranda Neto, |) | Case No. 16-10026-MSH |
| Debtor |) | Chapter 7 |
| |) | |
| _____ |) | |
| |) | |
| Shamrock Finance LLC, |) | |
| Plaintiff |) | |
| |) | Adversary Proceeding |
| v. |) | No. 16-01077 |
| Edgard Vasques de Miranda Neto, |) | |
| Defendant |) | |
| _____ |) | |

**JOINT MOTION TO EXTEND TIME TO
COMPLETE DISCOVERY AND FILE JOINT PRE-TRIAL MEMORANDUM**

Plaintiff Shamrock Finance LLC (“Shamrock” or “Plaintiff”) and Defendant, Edgard Vasques de Miranda Neto (“Defendant”) hereby move to extend the time to complete discovery and file the Joint Pretrial Memorandum in this matter for a period of thirty (30) days through and including April 2, 2017 for both deadlines.

In support to this motion, the parties state as follows:

1. Shamrock commenced this adversary proceeding on May 9, 2016 by the filing of a Complaint [Docket No. 1].
2. Edgard Vasques de Miranda Neto (“Vasques” or “Defendant”) filed his Answer to Complaint on June 13, 2016 [Docket No. 9]
3. Since the filing of Shamrock’s Complaint and Vasques’s Answer, the Parties filed their Joint Motion to Approve Rule 26(f) Discovery Plan (the “Discovery Plan”) which was approved by this Court on July 12, 2016.

4. Pursuant to the approved Discovery Plan and subsequent approved extensions, the present deadline for the parties to complete discovery and file a Joint Pre-Trial Memorandum is February 2, 2017.

5. The parties have completed all paper discovery, and have (or in the process of) exchanging documents. The parties have also discussed the possibility of conducting one or more depositions.

6. On March 3, 2017 the counsel for each party held a discovery conference by telephone pursuant to Rule 37.1 of the Local Rules of the United States District Court for the District of Massachusetts and Rule 7037-1 of the Massachusetts Local Bankruptcy Rules for purposes of completing the discovery process.

7. The parties require additional time to review all discovery received, including all recently produced documents, and possibly conduct one or more depositions, before preparing and filing a Joint Pretrial Memorandum. Further, an extension of time will allow the parties to continue on going settlement discussions in this matter.

WHEREFORE, the parties request that the Court extend the time to complete discovery and file Joint Pretrial Memorandum through and including April 2, 2017 for both deadlines, and

grant such other and further relief as is necessary and proper under the circumstances.

Respectfully submitted,
SHAMROCK FINANCE LLC
By its attorney,

/s/ James J. McNulty
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Dated: March 3, 2017

* Signed with permission pursuant to MLBR Appendix 8, Rule 8.